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SKF INDUSTRIES, INC.

ROBERT A. ZIMMERMAN | TREASURER AND ASSISTANT SECRETARY

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Mike
cc: MDR
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APR 07 1986

SUPERFUND BRANCH

March 27, 1986

"CERTIFIED MAIL"

Mr. Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division
United States Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

RECEIVED

APR 09 1986

USEPA, RCRA Branch

Re: EPA I.D. No. MOT300010345
SKF Automotive Products, Inc.
St. Louis, MO
MOD085909703
SKF Automotive Products, Inc.
Washington, MO

Dear Mr. Morby:

In compliance with the Federal Register in satisfying the financial test mechanism, the following documents are enclosed:

- Letter signed by SKF's Chief Financial Officer worded as specified in Section 264.151(f)
- * - SKF's 1985 Annual Report
- Statement from SKF's Independent Certified Public Accountants, Price Waterhouse.

Very truly yours,

R.A. Zimmerman
AEF:raa

Enclosure

* 1985 Annual Report is not included, will be mailed when received on 4/15/86.



R00025210

RCRA Records Center

SKF INDUSTRIES, INC.

Regional Administrator
United States Environmental
Protection Agency

Regional Administrator:

I am the chief financial officer of SKF Industries, Inc., 1100 First Avenue, King of Prussia, Pennsylvania 19406. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the attached scheduled facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility (see schedule attached).
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the scheduled facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility (see scheduled attached).
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the scheduled facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility (none).
4. This firm is the owner or operator of the scheduled hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility (none).

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.


Regional Administrator
United States Environmental
Protection Agency
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The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

I hereby certify that the wording of this letter is identical to the wording specified in 40CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

SKF INDUSTRIES, INC.


Bo Bergqvist
Vice President, Finance

March 27, 1986

SKF INDUSTRIES, INC.

ESTIMATED COST OF CLOSURE AND POST-CLOSURE

ON HAZARDOUS WASTE FACILITIES

DECEMBER 31, 1985

<u>EPA I.D. NUMBER</u>	<u>PLANT</u>	<u>ADDRESS</u>	<u>ESTIMATED CLOSURE COST</u>
PAD 000000190	Specialty Bearings Division	5400 Tulip St., Phila., PA 19124	None
PAD 000000182	Nice Bearings Products Div.	Detwiler Road, Kulpville, PA 19443	None
PAD 980716062	International Products Div.	1690 E. Race St., Allentown, PA 18103	None
PAD 042147652	Roller Bearings Division	Fame Ave., Ext. RD #3, Hanover, PA 17331	None
PAD 003026606	Roller Bearings Division	W. King St., Shippensburg, PA 17257	\$50,409
PAD 004344172	Ball Bearings Division	1000 Logan Blvd., Altoona, PA 16602	None
OHD 004205761	Tyson Tapered Bearings Div.	1339 Duncan St. S.W., Massillon, OH 44646	None
KYD 001737683	Tyson Tapered Bearings Div.	Highway 90, Glasgow, KY 42141	None
NYD 002209773	Mounted Bearings Division	Horton St., E. of Seneca, Hornell, NY 14843	None
IND 005460894	Bremen Bearings Corp.	Rt. 6 West, Bremen, IN 46506	None
PAT 000620823	Technology Services Div.	1100 First Ave., King of Prussia, PA 19406	None
MOT 300010345	SKF Automotive Products	2320 Marconi Avenue, St. Louis, MO 63110	\$37,726
MOD 085909703	SKF Automotive Products	1801 W. Main St., Washington, MO 63090	\$28,480
THD 000742267	SKF Automotive Products	Alexander St., Bradford, TN 38316	None
CAD 063553630	Dura-Bond Bearing Co.	3201 Ash St., Palo Alto, CA 94306	<u>\$4,468</u>
			<u>\$121,083</u>

SKF INDUSTRIES, INC.

ALTERNATIVE I

1. Sum of current closure and post-closure cost estimates	\$121,083
2. Total Liabilities	134,579,000
3. Tangible net worth	131,590,000
4. Net Worth	131,590,000
5. Current assets	171,265,000
6. Current liabilities	77,029,000
7. Net working capital (line 5 minus line 6)	94,236,000
8. The sum of net income plus depreciation, depletion and amortization	647,000
9. Percent of assets in U.S.	100%
	<u>Yes</u> <u>No</u>
10. Is line 3 at least \$10 million?	X
11. Is line 3 at least 6 times line 1?	X
12. Is line 7 at least 6 times line 1?	X
13. Are at least 90% of firm's assets located in the U.S.?	X
14. Is line 9 at least 6 times line 1?	N/A
15. Is line 2 divided by line 4 less than 2.0?	X
16. Is line 8 divided by line 2 greater than 0.1?	X
17. Is line 5 divided by line 6 greater than 1.5?	X

Price Waterhouse



January 17, 1986

Mr. Daniel F. Collins
Vice President and
Corporate Controller
SKF Industries, Inc.

Dear Mr. Collins:

At your request, we have performed the procedures enumerated below with respect to the selected financial data of SKF Industries, Inc. (the "Company") set forth in the accompanying exhibit and to be contained in letters from you to the United States Environmental Protection Agency and selected state authorities. These procedures were performed solely to assist you in complying with the regulations of the United States Environmental Protection Agency under authority of the Resource Conservation and Recovery Act. The procedures we performed are summarized as follows:

1. We compared the amounts in the accompanying exhibit for total liabilities, net worth, current assets and current liabilities with amounts in the Company's consolidated financial statements at December 31, 1985.
2. We compared the amounts in the accompanying exhibit for tangible net worth and for the sum of net income plus depreciation, depletion and amortization to amounts calculated from the Company's consolidated financial statements at December 31, 1985 and for the fiscal year then ended.
3. We compared the response to Item 7 in the accompanying exhibit with data in the Company's accounting records as of December 31, 1985.

Because the above procedures were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the specific items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified items should be adjusted. This report relates to the items specified above and does not extend to the consolidated financial statements of the Company, taken as a whole.

Price Waterhouse

EXHIBIT

SKF INDUSTRIES, INC.

SELECTED FINANCIAL DATA
AS OF DECEMBER 31, 1985 AND FOR
THE FISCAL YEAR THEN ENDED

<u>Item</u>	<u>Description</u>	<u>Amount</u>
1.	Total liabilities	\$134,579,000
2.	Tangible net worth	\$131,590,000
3.	Net worth	\$131,590,000
4.	Current assets	\$171,265,000
5.	Current liabilities	\$77,029,000
6.	The sum of net income plus depreciation, depletion and amortization	\$647,000
7.	Percentage of assets located in the U.S. to total assets	100%